

# Together With



FALL 2007

A PUBLICATION OF THE TENNESSEE DEPARTMENT OF LABOR &amp; WORKFORCE DEVELOPMENT

## Personal Protective Equipment Training



Before performing duties where personal protective equipment (PPE) is required, all employees must be trained on its proper use. The training must include when PPE must be worn, specifically which type of PPE must be worn, and how to properly put it on, take it off, adjust it, and wear it. The absence of training on any of these conditions can reduce or eliminate the protection the equipment provides. Additional training must be conducted to acquaint employees with the limitations of their PPE so that they do not take risks because of a belief that they are protected when indeed they are not. For example, goggles selected to protect the employees from flying chips (impact hazard) are not appropriate for use as

protection against chemical hazards because chemicals can destroy the material from which the impact goggles are made. Finally, employees using PPE must be trained to properly care for their PPE, to maintain it properly, and to dispose of it properly when the time comes. The employee should also be taught how to determine when the useful life of the PPE has ended and the time has come for replacement.

When the training is completed, the employer must create and maintain a certification document containing the name of each employee trained, the date(s) of the training, and the subject of the certification. Retraining must be conducted when workplace changes dictate a change in PPE, when the type of PPE changes, or when inadequacies in the employee's use or knowledge of PPE is observed.



Remember, TOSHA requires the use of PPE to reduce employee exposure to hazards only when engineering and administrative controls are not feasible or effective in reducing exposures to acceptable levels. PPE is not the first line of defense against workplace hazards; it's the last.

### How to Become an OSHA Authorized Trainer

You may become an OSHA authorized (approved, not certified) trainer. This authorization allows you to teach the OSHA authorized 10-hour and 30-hour General Industry courses and/or the authorized 10-hour and 30-hour Construction courses. To become an OSHA authorized trainer you must attend the 40-hour Trainer Course in Occupational Safety and Health Standards for General Industry (course #501) and/or the 40-hour Trainer Course in Occupational Standards for the Construction Industry (course #500). These courses must be taught by an OSHA Training Institute (OTI) Education Center. In the southeast these are Georgia Tech in Atlanta, Eastern Kentucky University in Richmond, Kentucky, and the University of South Florida in Tampa, Florida.

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Together with TOSHA is the newsletter of the Division of Occupational Safety and Health.

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Comments and suggestions are welcome.

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Together with TOSHA is a quarterly publication of the Tennessee Department of Labor and Workforce Development, Authorization No. 337352; 19,300 copies; December 2007; \$0.14 per copy. The Tennessee Department of Labor and Workforce Development is committed to principles of equal opportunity, equal access, and affirmative action. Auxiliary aids and services are available upon request to individuals with disabilities.

## How to Become an OSHA Authorized Trainer (continued)

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Prerequisites for attending the trainer courses are five years relevant experience in the construction and/or general industry safety and health fields and attendance at course #510 (for construction) or course #511 (general industry). You do not have to be an OSHA-approved trainer to train employees for anything other than the official OSHA 10-and 30-hour courses. You may contact the above referenced OSHA Training Institute Education Centers for more information and a schedule of their #501/500 course offerings as follows:

**Georgia Tech** [www.oshainfo.gatech.edu/](http://www.oshainfo.gatech.edu/) **800-653-3629**  
**University of South Florida** [www.usfotcenter.org](http://www.usfotcenter.org) **800-852-5362**  
**Eastern Kentucky University** [www.ceo.eku.edu/osa](http://www.ceo.eku.edu/osa) **859-622-8405**

## TOSHA Annual Report

From July 1, 2006, through June 30, 2007, TOSHA's 42 Occupational Safety Specialists and 30 Industrial Hygienists served Tennessee's 137,810 employers and 2,769,892 employees in an attempt to ensure that all those employees had a safe and healthy year at work. Those employees worked in the private and public sectors in agriculture, construction, and general industry. In the public sector, the employees of 132 utilities, 36 school systems, and 320 cities and counties were covered by TOSHA.

In that same time period, TOSHA's enforcement officers conducted 2,212 inspections and identified 8,018 workplace hazards. Civil penalties assessed for the violations of TOSHA standards and regulations amounted to \$2,075,374. TOSHA's consultation officers conducted 444 invited visits to Tennessee workplaces, identified 3,321 hazards and, in accordance with their mandate, issued no civil penalties. The top cited health standard in general industry by average penalty was the process safety management standard, 29 CFR 1910.119; the top cited safety standard by average penalty in general industry was the failure to report a workplace fatality to TOSHA, TDL Rule 0800-1-3-.05; and in construction the top cited standard by average penalty was the excavation standard, 29 CFR 1926.652.

During the year, one change was made to the TOSHA Act. The Governor signed legislation on May 4, 2007, to allow TOSHA to deliver citations via hand delivery or delivery service with delivery receipt, in addition to certified mail. Formerly, citations could only be delivered by certified mail; however, certified mail will continue to be the initial method of delivery for most citations. The general industry electrical standards were updated by Federal OSHA and adopted by TOSHA to correspond with the 2000 edition of NFPA70E, which was used as the foundation of the revised standard. TOSHA has one new video available for purchase for \$20. It is "Personal Protective Equipment—Part 2, Training Your Employees to Use PPE Properly." It is the companion video to "Personal Protective Equipment—Part 1" on how to develop a personal protective equipment program.

**And last, the TOSHA central office has moved to a new location in Nashville. The new address is 220 French Landing Drive, Nashville, TN 37243-1002.**

# TOSHA TIPS

**Condition:** An employee using a tight-fitting facepiece respirator was not fit tested annually.

**Potential Effects:** Effective use of a respirator depends on the facepiece fit. Improper fit can lead to over-exposure to hazardous chemicals.

**Standard:** 29 CFR 1910.134(f)(2)

**Recommended Action:** Perform annual fit testing for each employee who uses a tight-fitting facepiece respirator. The fit test shall be administered using an OSHA-accepted protocol. The OSHA-accepted protocols and procedures are contained in Appendix A of the standard. Additional fit tests must be performed whenever the employee reports, or the employer, physician or other licensed health care professional (PLHCP), supervisor, or program administrator makes visual observations of changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight. If after passing a fit test, the employee tells the employer, program administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable, the employee shall be given a reasonable opportunity to select a different respirator facepiece and to be retested. Fit testing of tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators shall be accomplished by performing quantitative or qualitative fit testing in the negative pressure mode, regardless of the mode of operation (negative or positive pressure) that is used for respiratory protection.



## True or False? Topic: Excavations and Trenching

### Questions

- True or False—Employees are working in a trench six feet deep and 10 feet wide at the bottom. The soil is a mixture of clay and granular soil. It is okay for the sides of this excavation to be vertical with no shoring because employees can get far enough away from a wall collapse due to the width of the trench at the bottom.
- True or False—An excavation less than five feet in depth must be effectively protected when examination of the ground indicates hazardous earth movement may be expected.
- True or False—A trench only needs to be inspected by a qualified person after a rainstorm.
- True or False—I can put my spoil pile next to the excavation as long as it is no more than two feet high.
- True or False—The employer must identify the location of all underground utilities before beginning an excavation.

### Answers

- False—the trench must be sloped, shored, or a trench box used.
- True
- False—daily inspections must be made
- False—excavated material must be stored not less than 2 feet away from the edge of the excavation regardless of the height of the pile.
- True

# LEARN & LIVE

**TOSHA Consultative Services Problem Solver**

Employee noise exposure at a trim saw at a middle Tennessee lumber company was documented by TOSHA Consultative Services at 103.4 dBA. An effective hearing conservation program was already in place at the mill, and the company required all employees to wear hearing protection. The above sampling results, however, proved that the trim saw operator needed to wear double hearing protection, plugs and muffs until the noise exposure could be reduced to levels where single protection could bring his exposure below 90 dBA.

With help from Consultative Services the company explored appropriate engineering controls to lower the noise level produced by the trim saw. The company reduced the overall diameter of the saw, reduced the gullet of the tooth on the blades, and placed eggshell and quilting material around the machine. With a combination of these methods, the employee exposure was reduced to 98.2 dBA, and the operator could go back to the use of single hearing protectors.



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